

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MARK A. FAVORS, HOWARD LEIB, LILLIE  
H. GALAM, EDWARD A. MULRAINE,  
WARREN SCHREIBER, and WEYMAN A.  
CAREY,

Plaintiffs,

DONNA K. KAYE, EDWIN ELLIS, AIDA  
FORREST, GENE A. JOHNSON, JOY WOOLLEY,  
SHEILA WRIGHT, LINDA LEE, SHING CHOR  
CHUNG, JULIA YANG, JUNG HO HONG, JUAN  
RAMOS, NICK CHAVARRIA, GRACIELA  
HEYMAN, SANDRA MARTINEZ, EDWIN  
ROLDAN, MANOLIN TIRADO, LINDA ROSE,  
EVERET THOMPSON-WEREKOH, CARLOTTA  
BISHOP, CAROL RINZLER, GEORGE  
STAMATIADES, JOSEPHINE RODRIGUEZ,  
SCOTT AUSTER, EDWIN  
FIGUEROA, and SANTIAGO DIAZ,

DECLARATION OF  
EDWIN DEI  
Docket No. 11-cv-5632  
(RR) (GEL) (DLI) (RLM)

Intervenor – Plaintiffs,

-against-

ANDREW CUOMO, as Governor of the State  
of New York, DEAN G. SKELOS, as Majority  
Leader and President Pro Tempore of the Senate  
of the State of New York, SHELDON SILVER,  
as Speaker of the Assembly of the State of New  
York, ANDREA STWEART-COUSINS, as  
Minority Leader of the Senate of the State of  
New York, BRIAN M. KOLB, as Minority  
Leader of the Assembly of the State of New York,  
the NEW YORK LEGISLATIVE TASK FORCE  
ON DEMOGRAPHIC REAPPORTIONMENT (“LATFOR”), JOHN  
J. McENENY, as a Member of LATFOR, ROMAN  
HEDGES, as a Member of LATFOR, MARTIN  
MALAVE DILAN, as a Member of LATFOR, as a  
Member of LATFOR, and WELQUIS R. LOPEZ,  
as a Member of LATFOR,

Defendants.

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**EDWIN DEI**, declares the following to be true under penalty of perjury pursuant to 28

U.S.C. Section 1746

1. My name is Edwin Dei. I am engaged as a consultant expert on the Favors case by the Center for Law and Social Justice of Medgar Evers College, City University of New York, which represents the Drayton Plaintiffs-Intervenors in this matter.

2. I received my Bachelor of Arts degree in Economics from Fordham University in 1981, and my Master of Arts in International Political Economy and Development from Fordham in 1986. See Exhibit A attached hereto.

3. I have extensive experience in research and data and statistical analysis. Professionally, the positions that I have held include the following:

*Consultant*, The Round Table of Institutions of People of Color and the Women of Color Policy Network, New York University Wagner Graduate School of Public Service (2002-2005). Worked on research projects and prepared reports on poverty, labor markets and development.

*Senior Research Analyst*, NYC Department of Employment (1990-2002). Conducted economic research projects in employment and unemployment; provided labor market information for various units within the department and the Commissioners' office; calculated the Index of Need for all agency RFPs; evaluated employment training programs, among other research tasks.

*Member of Staff*, New York City Workforce Development Commission (7/1993-12/1993). Researched and presented data on employment in NYC industries and occupations; and prepared a report on NYC labor force projections.

*Equal Employment Opportunity Officer*, NYC Department of Employment (1992-1994). Enforced agency's Affirmative Employment Plan; investigated and resolved complaints.

*Associate Researcher*, Institute for Community Empowerment, Community Service Society (1988-1990). Conducted statistical analysis for research projects on poverty and employment issues.

*Researcher*, Department of Public Policy, Community Service Society (1983-1988). Developed and conducted research projects in employment and economic development in support of the development of public policy.

*Associate Researcher*, National Urban League, Inc. New York (1981-1983). Conducted data collection, statistical analyses, literature reviews; and, prepared reports on research findings.

4. In the Favors case, my primary responsibility was to assist in the development of Black majority-minority districts in the 2012 Unity Plan Congressional map. To this end, I reviewed and analyzed census data and other relevant data, met with and had telephonic conferences with Plaintiffs-Intervenors' counsel, Plaintiffs-Intervenors' two other experts, Frank Lewis and Dr. Zulema Blair and with the counsel and experts for the Lee and Ramos Plaintiffs-Intervenors. The hours on I expended on these activities are attached hereto as Exhibit B.

5. Plaintiffs-Intervenors have requested that I be paid at an hourly rate of \$75.00. This hourly rate is reasonable in of my skills, expertise and reputation. Accordingly, I respectfully request compensation in the amount of \$675 for the 9 hours that I devoted to this matter.

Dated: Brooklyn, New York  
December 18, 2013

Respectfully submitted,

/s/ Edwin Dei  
Edwin Dei

# EXHIBIT A

## **EDWIN DEI**

135 Centre Street  
Mount Vernon, NY  
(914) 699-0748  
[epkdei@aol.com](mailto:epkdei@aol.com)

### **EXPERIENCE:**

#### **CONSULTANT, Census and Redistricting Project**

Center for Law and Social Justice, Medgar Evers College, City University of NY.  
2010-present

Work on special projects; currently working on redistricting to ensure fair racial and ethnic representation at levels of government.

#### **CONSULTANT**

Roundtable of Institutions of People of Color & Women of Color Policy Network,  
Wagner School of Public Policy, New York University, NY.2002-2005

Worked on research projects and prepared reports on poverty, labor markets and development.

#### **SENIOR RESEARCH/ANALYST, Research and Evaluation**

New York City Department of Employment. 1990-2002

As senior researcher, conducted economic research projects including labor force, industry and occupation trends; collected and analyzed data on economic problems; provided labor market information for various units within the department and the Commissioners' office; prepared reports on labor market issues and was frequently called upon to comment on the local employment scene; calculated the Index of Need for all agency RFPs; co-authored a report on cost benefit analyses of agency programs; evaluated employment training programs.

#### **COMMISSION STAFF, New York City Workforce Development Commission**

New York City Department of Employment. 7/1993-12/1993

Researched and presented data on employment in New York City industries and occupations; and prepared a report on NYC labor force projections.

#### **OFFICER, Equal Employment Opportunity**

New York City Department of Employment. 1992-1994

Enforced agency's Affirmative Employment Plan; investigated and resolved complaints; prepared EEO reports; and organized (the first) sexual harassment prevention training for agency employees.

**ASSOCIATE RESEARCHER, Institute for Community Empowerment**

Community Service Society of New York. 1988-1990

Conducted statistical analysis for research projects on poverty and employment issues; organized and analyzed data for presentation and research projects.

**RESEARCHER, Department of Public Policy**

Community Service Society of New York. 1983-1988

Developed and conducted research projects in employment and economic development in order to develop policy.

**RESEARCH ASSOCIATE**

National Urban League, Inc., New York. 1981-1983

Conducted data collection, statistical analysis, literature reviews; and prepared reports on research findings.

**PUBLICATIONS**

Stafford, Walter and Dei, Edwin P. Employment Segmentation in New York Municipal Agencies. Community Service Society, Institute for Empowerment, New York, January 1989.

**Conducted statistical analysis and assisted in the writing of:**

The New Workforce, Investing in New York City's Competitiveness.  
Report by the New York Workforce Development Commission.

Stafford, Walter. Closed Labor Markets: Underrepresentation of Blacks, Hispanics and Women in New York City's Core Industries and Jobs. Community Service Society, 1985.

Stafford, Walter. A study of issues of Black Administrators in Predominantly White Colleges and Universities: Black Administrators in Predominantly White Universities. Massachusetts Institute of Technology, Massachusetts, 1983.

Stafford, Walter. A study of Occupational Segregation and Affirmative Planning in New York City. U.S. Commission on Civil Rights, 1983.

**EDUCATION:**

Fordham University, New York, M.A in International Political Economy and Development, 1986

Fordham University, New York, B.A. in Economics, 1981

**AFFILIATIONS**

Amnesty International USA, member

**REFERENCES**

Available upon Request.

# EXHIBIT B

EDWIN DEI  
TIME RECORDS  
Favors v. Cuomo

<b>Date</b>	<b>Activity</b>	<b>Time</b>
10/12/2012	Meeting with CLSJ, Latino Justice/PRLDEF and AALDF re: congressional districts	2.00
12/15/ 2012	Meeting with Drayton, Ramos, Lee counsel and experts re congressional districts	2.00
1/17/2012	Meeting with Esmeralda Simmons re: Redistricting	1.00
2/15/2012	Meeting with Drayton, Ramos, Lee Counsel and experts re congressional districts	2.00
2/23/ 2012	Meeting with Drayton, Ramos, Lee Counsel and experts re congressional districts	2.00
	Total	9 hours